

\*\*E-filed 3/17/08\*\*

1 QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP

2 Scott G. Lawson (Bar No. 174671)

3 scottlawson@quinnemanuel.com

4 Patrick Doolittle (Bar No. 203659)

5 patrickdoolittle@quinnemanuel.com

6 Andrea Pallios Roberts (Bar No. 228128)

andreaproberts@quinnemanuel.com

50 California Street, 22nd Floor

San Francisco, California 94111

Telephone: (415) 875-6600

Facsimile: (415) 875-6700

7 Attorneys for Defendant

8 International Business Machines Corporation

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 (SAN JOSE DIVISION)

12 MARY HELEN WOODSON,

13 Plaintiff,

14 vs.

15 INTERNATIONAL BUSINESS MACHINES  
16 CORPORATION and DOES ONE through  
TWENTY, Inclusive,

17 Defendant.

CASE NO. C 05-03387 JF (PVT)

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING DEADLINE TO  
FILE RESPONSE TO THIRD AMENDED  
COMPLAINT AFTER CONSOLIDATION**

18  
19 WHEREAS, IBM's response to plaintiff's Third Amended Complaint After Consolidation  
20 is currently due on March 14, 2008, pursuant to the parties' February 29, 2008 stipulation;

21 WHEREAS, the parties are in continuing negotiation regarding the final language of  
22 settlement documentation and agree that an extension of time for IBM to file its response to  
23 plaintiff's Third Amended Complaint After Consolidation would provide them the time to do so  
24 and avoid any unnecessary increase in litigation costs that might affect the possibility of  
25 settlement;

26 WHEREAS, the parties will appear before the Court at the Case Management Conference  
27 scheduled for March 21, 2008 and will be prepared to update the Court on the status of the  
28 negotiations at that time;

1 WHEREAS, due to the prolonged settlement discussions, the parties have entered into four  
2 prior stipulations regarding extensions of time for IBM's response to Plaintiff's Third Amended  
3 Complaint After Consolidation, most recently on February 29, 2008, the purpose of which was to  
4 allow the parties time to negotiate a settlement and then draft settlement documentation;

5 NOW, THEREFORE, IT IS HEREBY STIPULATED, by and between the parties, that  
6 IBM's response to Plaintiff's Third Amended Complaint After Consolidation shall be due on or  
7 before March 28, 2008.

8 Dated: March 13, 2008

MARY HELEN WOODSON

9  
10 By /s/ Mary Helen Woodson  
Mary Helen Woodson

11  
12 Dated: March 13, 2008

QUINN EMANUEL URQUHART OLIVER &  
HEDGES, LLP

13  
14  
15 By /s/ Scott G. Lawson  
Scott G. Lawson  
16 Attorneys for Defendant  
International Business Machines Corporation  
17

18 **Order**

19 Pursuant to the foregoing stipulation between the parties, IT IS SO ORDERED.

20  
21 Dated: 3/17/08

  
22 Jeremy Fogel  
United States District Judge  
23  
24  
25  
26  
27  
28

**Signature Attestation**

I hereby attest that Plaintiff Mary Helen Woodson read and agreed to the above  
**STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINE TO FILE  
RESPONSE TO THIRD AMENDED COMPLAINT AFTER CONSOLIDATION** and gave  
Quinn Emanuel permission to sign and file the stipulation on her behalf.

Dated: March 13, 2008

QUINN EMANUEL URQUHART OLIVER &  
HEDGES, LLP

By /s/ Andrea Pallios Roberts

Andrea Pallios Roberts

Attorneys for Defendant

International Business Machines Corporation

**CERTIFICATE OF SERVICE**

I am employed in the County of San Mateo, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 555 Twin Dolphin Drive, Suite 560, Redwood Shores, California 94065-2139.

On **March 13, 2008**, I served true copies of the following document(s) described as **STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINE TO FILE RESPONSE TO THIRD AMENDED COMPLAINT AFTER CONSOLIDATION** on the parties in this action as follows:

**BY MAIL:** On **March 13, 2008**, I enclosed the foregoing into sealed envelope(s) addressed as shown above, and I deposited such envelope(s) in the mail at Redwood Shores, California. The envelope was mailed with postage thereon fully prepaid.

**BY ELECTRONIC MAIL TRANSMISSION:** By electronic mail transmission from andreaproberts@quinnemanuel.com on **March 13, 2008**, by transmitting a PDF format copy of such document(s) to each such person at the e-mail address listed below their address(es). The document(s) was/were transmitted by electronic transmission and such transmission was reported as complete and without error.

Mary Helen Woodson  
475 Milan Drive, #102  
San Jose, CA 95134  
Telephone: 408-944-9152  
Cell Phone: 408-206-4087  
helenwoodson@gmail.com

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on **March 13, 2008**, at Redwood Shores, California.

/s/ Andrea Pallios Roberts  
Andrea Pallios Roberts